

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WOLFIRE GAMES, LLC, SEAN COLVIN,
SUSANN DAVIS, DANIEL ESCOBAR,
WILLIAM HERBERT, RYAN LALLY, HOPE
MARCHIONDA, EVERETT STEPHENS,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

VALVE CORPORATION,

Defendant.

CASE NO.: 2:21-cv-00563-JCC

DARK CATT STUDIOS HOLDINGS, INC., and
DARK CATT STUDIOS INTERACTIVE LLC,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

VALVE CORPORATION,

Defendant.

CASE NO.: 2:21-cv-00872-JCC

**DECLARATION OF JOSEPH C.
BOURNE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPOINTMENT OF CO-LEAD
INTERIM COUNSEL FOR
PROPOSED DEVELOPER CLASS**

Declaration of Joseph C. Bourne

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2 1. I am an attorney licensed to practice in the States of Minnesota and California and
3 have been admitted to practice in several courts across the country. I am senior counsel with the
4 firm of Lockridge Grindal Nauen P.L.L.P. (“LGN”), attorneys of record for Plaintiffs Dark Catt
5 Studios Holdings, Inc., and Dark Catt Studios Interactive LLC (collectively “Dark Catt”), in the
6 action *Dark Catt Studios Holdings, Inc. v. Valve Corp.*, No. 2:21-cv-00872 (W.D. Wash.).

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8 2. I submit this declaration in support of the accompanying Plaintiffs’ Motion for
9 Appointment of Co-Lead Interim Counsel for Proposed Developer Class Pursuant to Federal Rule
10 of Civil Procedure 23(g)(3). I have personal knowledge of the facts in this declaration and could
11 competently testify to them if called as a witness.

12 3. I am committed to prosecuting this case. If the Court appoints my firm as co-lead
13 counsel in this litigation, I will devote myself personally to its prosecution.

14 4. I have practiced antitrust and class action litigation in numerous multidistrict,
15 consolidated, and complex class actions throughout the country for over a decade.

16 5. Before entering private practice, I served as a judicial law clerk to Judge Francis J.
17 Connolly and then-Chief Judge Edward Toussaint, Jr., at the Minnesota Court of Appeals.

18 6. I graduated *magna cum laude* from the University of Minnesota Law School in
19 2009, where I served as an Articles Editor for the Minnesota Law Review.

20 7. I have been named as a Super Lawyers Rising Star by my peers every year from
21 2014 to 2020.

22 8. I am dedicated to serving the local community. I was named a North Star Lawyer
23 by the Minnesota State Bar Association from 2012 to 2014 in recognition of my pro bono work. I
24 also served as a volunteer attorney in the District of Minnesota and Minnesota Chapter of the
25 Federal Bar Association’s Pro Se Project.
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9. I am currently, or have recently been actively involved in, the following major antitrust cases: *In re Pork Antitrust Litig.*, Case No. 18-cv-1776 (D. Minn.) (firm appointed co-lead counsel for direct purchaser plaintiffs in case alleging supply-reduction and price-fixing conspiracy of pork sold in United States; discovery is ongoing; partial settlements with two defendants totaling \$107.5 million); *Wood Mountain Fish, LLC v. Mowi ASA*, No. 1:19-cv-22128 (S.D. Fla.) (firm appointed co-lead counsel for indirect purchaser plaintiffs in case alleging price-fixing conspiracy of farmed salmon sold into and in the United States); *In re Packaged Seafood Prods. Antitrust Litig.*, No. 15-md-2670 (S.D. Cal.) (counsel for end payer plaintiffs in case alleging price-fixing conspiracy relating to packaged tuna sold in the United States; one defendant has settled for \$20 million; court's order granting class certification is currently on appeal); *In re Freight Forwarders Antitrust Litig.*, No. 08-cv-00042 (E.D.N.Y.) (firm appointed co-lead counsel for direct purchaser plaintiffs in case alleging conspiracy to fix price of certain surcharges in freight forwarding industry; recovered over \$400 million for the class).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of August, 2021.

s/ Joseph C. Bourne
Joseph C. Bourne